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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

PR Docket 92-235

In the Matter of )  
Replacement of Part 90 )  
by Part 88 to Revise the )  
Private Land Mobile Radio )  
Service and Modify the )  
Policies Governing Them. )

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COMMENTS OF  
SUFFOLK COUNTY POLICE DEPARTMENT  
OF NEW YORK STATE

The Suffolk County Police Department and its administrative County Government of Suffolk County, Long Island, New York hereby express their support and concerns regarding the Federal Communications Commission's (FCC) Notice of Proposed Rule Making (NPRM), Docket No. 92-235. Suffolk County supports and commends the Commission for this undertaking. We nonetheless echo the concerns raised by the Associated Public Safety Communications Officers (APCO) and the Land Mobile Communications Council (LMCC) in their comments regarding Docket 92-235. Suffolk County, having a population of well over one million residents and geographically covering 900 square miles on Long Island, in the State of New York, utilizing high band VHF and UHF for its existing police communications, considers it extremely important that we also comment along with others about this important Docket.

First, we commend the PRB for taking on this important task, as it

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As a matter of particular concern and consistent with our spectrum shortage interests, Suffolk County, wishes to emphasize the loss of spectrum to the public safety services in high band (VHF) as proposed in the docket via the innovative shared use proposal.

need is for additional radio spectrum, not to reduce the overall spectrum available to public safety.

Suffolk County believes that the concept of blocking all public safety services together would provide for a more efficient allocation of spectrum. The close spacing of public safety operations would be better than the interleave of a commercial third party carrier among public safety. It would be prudent for the Commission to retain the public safety services block in the 150-160 Mhz band and eliminate the proposed interleaving.

The Commission's band splitting proposal is consistent with the requirement of increasing the number of channels available to police and local government. The move to 12.5 Khz as a standard channel bandwidth for all private land mobile services is acceptable to Suffolk County. The 12.5 KHz proposal is also in concert with the APCO Project 25 efforts. The further reduction to 5 Khz channel bandwidth as proposed in the NPRM (Docket 92-235) for the 150-160 Mhz band is not seen by the radio industry's major manufacturers as an immediate possibility. The recommendation of a 6.25 Khz band-width as the narrowest feasible channel width for all radio bands does, on the other hand, seem to provide the most realistic long-range migration path for the industry to take, but even here we suggest the Commission exercise caution until experience is gained at these very narrow bandwidths.

We agree with the 12.5 Khz channel bandwidth but take exception to a further reduction before the radio industry can provide assurances that such further reduction will work at reasonable cost with available equipment. We also concur with APCO's and the LMCC's recommendation to revisit technology in five years after the Report and Order is adopted.

The time schedule to implement this band split requirement must, however, take into consideration the economic factors that are a real and major concern for Suffolk County and other local government budgets. This must be balanced against the immediate needs of spectrum relief for major metropolitan/urban areas such as Suffolk County. Incorporating a 12.5 KHz standard should start as early as the adoption of the Rule and Order. Mandatory requirement for implementing a 12.5 KHz bandwidth should follow eight (8) years hence. Technological offerings such as dual mode (25 KHz/12.5 KHz) radios could provide a smooth transition to permit public safety radio services to comply with a 12.5 MHz plan.

The NPRM also requires a possible reduction in transmitter power relative to overall antenna height. Police and local government radio communications are traditionally designed to provide the required coverage of the service area at the least cost. Reducing transmitter power will cause a potentially dangerous reduction of coverage area. Understandably, power, antenna height and terrain render an important aspect to frequency reuse. However, if

restrictions are applied to individual systems design (e.g., reasonable power and antenna design to limit coverage to the need), the Commission's goals will still be met. Such restrictions as the Commission's proposal will require additional sites for Suffolk County, necessitating additional frequencies and financial hardships to the County. In addition, the power reductions could cause life-threatening safety problems because of the lack of radio coverage.

In Suffolk County, the County Police will be required to reduce power and/or reduce existing antenna heights and shrink coverage. Additional towers will be necessary in four of the six precinct areas with the addition of associated microwave and VHF radio equipment. The proposed power reduction as defined will cost Suffolk County's taxpayers upwards of five (5) million dollars for the revised infrastructure. This figure does not include the necessary in-street radio equipment. None of this expense will improve the features of the radio equipment nor provide Suffolk County Police any additional benefits. This expense will only provide a return of the coverage we now have.

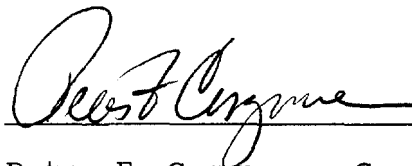
The potential loss of mobile relay operation in the 150-160 Mhz band, as APCO indicates, will further change our operation. There are presently 19,000 such repeaters in operation, licensed nationally to public safety services, Suffolk County being one of them. The loss of this radio function for police and local

government would be extremely critical to our normal day-to-day radio operation. Suffolk County Police along with most other police services in this area operate totally in a repeater mode on high band VHF in order to provide the needed mobile to mobile coverage.

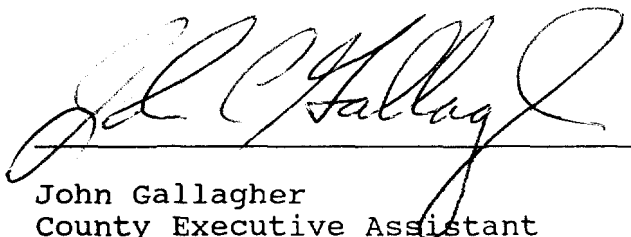
In conclusion, Suffolk County supports the Commission in concept with this proposed rule change. We support the preliminary comments of APCO in their concern for public safety continued communications cooperation. Suffolk County views this proposed rule change as a most compelling and aggressive legislation coming from the Private Radio Bureau that will influence the future of police and local government radio communications for many years.

Public safety's demand for better service is always prevalent at all levels of government. Therefore, it is necessary that police and local governments have the ability to communicate at a quality level, utilizing features at least equal to, if not better than, the standards in use today. Greater demand for more information for the police officer at the "street level" has impacted the spectrum requirements. We agree that we must increase efficiency of available spectrum, but we must not compromise quality or features in doing so. Suffolk County, therefore, feels that 12.5 KHz is the correct step and further mandated reductions must be reviewed as technology advances and history is accumulated on the very narrow bandwidths.

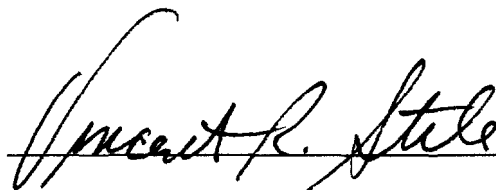
Respectfully submitted,



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